

Message Text

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ORIGIN EB-07

INFO OCT-01 ISO-00 EA-07 ERDA-05 AID-05 CEA-01 CIAE-00

CIEP-01 COME-00 DODE-00 FPC-01 H-02 INR-07 INT-05

L-03 NSAE-00 NSC-05 OMB-01 PM-04 USIA-06 SAM-01

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E.O. 11652: N/A

TAGS: ENRG

SUBJECT: U.S. COMMENTS ON PROPOSED REVISIONS TO IEA EMERGENCY DATA QUESTIONNAIRES A AND D.

1. FOLLOWING ARE U.S. COMMENTS ON PROPOSED REVISIONS AND ADDITIONS TO QUESTIONNAIRES A AND D CIRCULATED TO IEA MEMBER COUNTRIES AT THE SEQ MEETING ON OCTOBER 7-8 UNDER COVER OF DOCUMENTS IEA/SEQ(75)45.2 AND IEA/SEQ(75)45.3. COMMENTS ARE KEYED TO PARAGRAPHS IN THE PROPOSED QUESTIONNAIRES AND SHOULD BE FORWARDED TO PETER HUGGINS, IEA SECRETARIAT. COMMENTS ON QUESTIONNAIRE B FOLLOW SEPARATELY.

2. QUESTIONNAIRE A

A) INSTRUCTION NO. 2. THIS INSTRUCTION STATES THAT UNDER IMPORTS AND EXPORTS OF PRODUCTS, ASPHALTS, WAXES, FINISHED CHEMICALS, AND OTHER SPECIALTY PRODUCTS SHOULD NOT BE LIMITED OFFICIAL USE

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INCLUDED. QUESTIONNAIRE D, HOWEVER, SPECIFIES THAT THE

ABOVE ITEMS BE REPORTED UNDER PRODUCTS. IN ORDER TO KEEP THE QUESTIONNAIRES COMPATIBLE, THESE PRODUCTS SHOULD ALSO BE REPORTED ON QUESTIONNAIRE A.

B) REPORT NO. 1. A FOOTNOTE TO THIS REPORT INDICATES THAT AN ADDITIONAL REPORT ON NET INLAND DELIVERIES TO OTHER

COMPANIES MAY BE REQUIRED IN THE FUTURE. THIS POTENTIAL REPORT SHOULD NOT PRESENT A MAJOR PROBLEM; HOWEVER, FURTHER DEFINITIONS AS TO WHICH COMPANIES ARE REFERRED TO, I.E., THE REPORTING U.S. COMPANIES, OR ALL U.S. COMPANIES, SHOULD BE PROVIDED.

C) REPORT NO. 2. THE INSTRUCTIONS FOR THIS REPORT CALL FOR A CHANGE IN REPORTING THE DATE OF IMPORTS, FROM THE CUSTOMS CLEARANCE DATE, TO THE DATE THE IMPORTS ACTUALLY ARRIVE. THIS PROPOSED INSTRUCTION IS VERY VAGUE AND DOES NOT SPECIFY WHERE THE IMPORTS ARRIVE, I.E., ARE THEY REPORTED WHEN THEY REACH THE CUSTOMS DISTRICT, OR WHEN THEY ARRIVE AT THE DOCK, OR WHEN THEY ARRIVE AT REFINERY, ETC. THEREFORE, IN ORDER TO MAINTAIN CONSISTENCY AND AN AUDIT TRAIL, THE U.S. RECOMMENDS THAT THE "DATE RELEASED" ON THE CUSTOMS FORM BE USED. THIS DATE REPRESENTS THE DATE THE IMPORT IS LEGALLY ENTERED IN THE U.S., AND WOULD PROVIDE THE CLOSEST ARRIVAL TIME TO THE SECRETARIAT'S REQUEST.

D) REPORT NO. 3. THE INSTRUCTIONS CALL FOR A CHANGE IN REPORTING THE DATE OF EXPORTS, FROM THE CUSTOMS CLEARANCE DATE TO THE DATE THE EXPORTS ACTUALLY DEPART. AGAIN, AS DISCUSSED IN 2(C) ABOVE, THIS DATE WOULD NOT PROVIDE THE REQUIRED CONSISTENCY AND AUDIT TRAIL. TO BE COMPATIBLE, THE U.S. RECOMMENDS THAT THE "CUSTOMS CLEARANCE DATE," WHICH IS THE EXPORT VERSION OF THE "DATE RELEASED," BE USED.

E) REPORT NO. 4. THE NEW INSTRUCTIONS DELETE THE FORMER SIZE RESTRICTION OF "GREATER THAN 20,000 METRIC TONS" IN REQUESTING INVENTORY DATA FROM REFINERY TANKAGE AND PRODUCT TERMINALS. THE CURRENT U.S. PETROLEUM INFORMATION SYSTEM ONLY GATHERS INVENTORY INFORMATION ON FACILITIES OF 7000 METRIC TONS OR MORE. THIS WILL BE THE SIZE RESTRICTION FOR U.S. REPORTING PURPOSES.

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3. QUESTIONNAIRE D

A) REPORT NO. 2. THE INSTRUCTIONS FOR THIS REPORT CALL FOR A CHANGE IN REPORTING THE DATE OF IMPORTS, FROM THE

CUSTOMS CLEARANCE DATE TO THE DATE WHEN THE IMPORTS ACTUALLY ARRIVE. AS NOTED IN PARAGRAPH 2(C) ABOVE THE US BELIEVES THESE INSTRUCTIONS SHOULD BE MORE CLEARLY DRAFTED AND AGAIN RECOMMENDS THAT TO MAINTAIN CONSISTENCY AND AN AUDIT TRAIL, THE "DATE RELEASED" ON THE CUSTOMS FORM BE USED. THIS DATE REPRESENTS THE DATE THE IMPORT IS LEGALLY ENTERED IN THE

U.S., AND WOULD PROVIDE THE CLOSEST ARRIVAL TIME TO THE SECRETARIAT'S REQUEST.

B) REPORT NO. 3. THE INSTRUCTIONS CALL FOR A CHANGE IN REPORTING THE DATE OF EXPORTS FROM THE CUSTOMS CLEARANCE DATE TO THE DATE THE EXPORTS ACTUALLY DEPART. AS INDICATED IN PARAGRAPH 2 (D) ABOVE AND TO MAINTAIN CONSISTENCY WITH PARA 3 (A) T U.S. RECOMMENDS THAT THE "CUSTOMS CLEARANCE DATE" WHICH IS THE EXPORT VERSION OF THE "DATE RELEASED," BE USED.

C) ANNEX II (DEFINITIONS OF OIL PRODUCT GROUPS). THE IEA DEFINES "OTHER PRODUCTS" AS INCLUDING ASPHALTS, WAXES, ETC. AS NOTED IN COMMENTS ON QUESTIONNAIRE A (PARA 2 (A)) THE HANDLING OF THESE PRODUCTS UNDER QUESTIONNAIRE A AND B IS DIFFERENT FROM THAT UNDER QUESTIONNAIRE D. IF IT IS NOT ADVISABLE TO INCLUDE THESE PRODUCT CATEGORIES UNDER QUESTIONNAIRES A AND B, THEY SHOULD ALSO BE DELETED IN QUESTIONNAIRE D.

D) ANNEX II ALSO CONTAINS A LIST OF CHANGES TO MAKE QUESTIONNAIRE D CONSISTENT WITH THE OECD OIL COMMITTEE REPORTING SYSTEM. THESE CHANGES INCLUDE BREAKING DOWN LIMITED OFFICIAL USE

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GASOLINE AND KEROSENE INTO TWO GROUPS EACH. A BETTER DEFINITION OF THE BREAKDOWN AND THE NEED FOR IT WILL BE REQUIRED BEFORE IT CAN BE DETERMINED IF THE U.S. CAN MEET THIS CHANGE, I.E., BETTER PRODUCT CLASSIFICATIONS ARE NEEDED TO BE CERTAIN IF WE CAN FIT THE ABOVE PRODUCTS INTO THE PROPER CLASSES. INGERSOLL

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